

**OFFICIAL FILE**  
**ILLINOIS COMMERCE COMMISSION**

**ORIGINAL**

ILLINOIS  
COMMERCE COMMISSION

~~Docket #030438~~

2004 DEC 10 A 10:53 *mb*

In re the Matter of:  
**Motion Telecom, Inc.**  
7101 S. Fulton Street, Suite 200  
Centennial, CO 80112

CHIEF CLERK'S OFFICE

*CA-5766*

**Verified Application to Withdraw Certificate of Service and Tariff  
of Motion Telecom, Inc. ("Motion"),**

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Pursuant to the applicable Statutes of this State and the Commission's Rules and Regulations currently in effect and/or subsequently enacted, Motion Telecom, Inc., a Colorado corporation ("Motion") hereby respectfully submit this Verified Application by and through Motion Telecom, Inc. to this Commission requesting the withdrawal of Motion's Certificate of Service as a long distance reseller of telecommunications services (non-facility based) and its tariff.

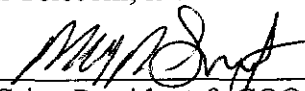
Motion is a corporation organized under the laws of the State of Colorado, with its principal offices located at 7101 South Fulton Street, Suite 200, Centennial, Colorado 80112. Motion was granted its approval to resell interexchange toll telecommunications services to residential and small business customers in Illinois by the Commission on or about September 30, 2003. Motion is authorized to do business in 48 states and has fewer than 1,000 long distance customers in the state of Illinois.

This Application is made in connection with the transfer of substantially all of Motion's assets to Network US, Inc., including all of Motion's customers in the State of Illinois, which has previously been approved by the Commission. Accordingly, Motion is no longer operating in the State of Illinois.

Motion respectfully request that the Commission grant its Application for Withdrawal of Certificate of Service and its tariff on an expedited basis, effective on or before December 31, 2004.

In the event you have questions or discussion items, please contact Barbara H. Vonderheid, Vonderheid & Associates, P.C. at (303) 784-5329 direct, (303) 784-5367 fax or [bvonderheid@awipcs.com](mailto:bvonderheid@awipcs.com), counsel for the Applicant. Applicant will accept email service at this address.

Motion Telecom, Inc.

By:   
Mark Gritz, President & COO  
Dated: December 9, 2004

**VERIFICATION**

This application shall be verified under oath.

**OATH**

State of Colorado )  
County of Arapahoe )ss

Mark Britz makes oath and says that he is President/COO  
(Insert here the name of affiant) (Insert the official title of the affiant)

of Motion Telecom Inc  
(Insert here the exact legal title or name of the Applicant)

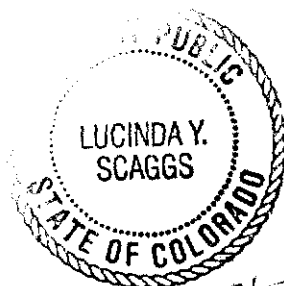
that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.

[Signature]  
(Signature of affiant)

Subscribed and sworn to before me, a Notary Public/ in state of Colorado  
(Title of person authorized to administer oaths)

in the State and County above named, this 9 day of December, 2004.

Lucinda Y. Scaggs  
(Signature of person authorized to administer oath)



My Comm. Expires 2/5/07